

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN
DISTRICT OF ILLINOIS EASTERN DIVISION

1. Bruce Giles - ID# 20080016005
2. Jose H. Romero - ID# 20030092847
3. Lee Mc Cor Ker - ID# 20080033535

Plaintiff(s)

V.S.

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Jun 26. 2009
MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

09C2071

1. Sheriff - Thomas Dart
2. Superintendent - Miller
3. Doctor - Jones
4. Nurse - Price

5. COOK COUNTY CIRCUIT COURT JUDGE TIMOTHY C. EVANSDefendant(s) - "IN THEIR INDIVIDUAL AND OFFICIAL CAPACITY....."Second Amended Complaint1. 42 U.S.C. § 1983 § 1985 (2) & (3) § 1986, Violation of I.R.F.R.A.
("I.R.F.R.A.") 775 ILCS 35/1 Et Seq.

On the date of February 12th, 2009, The Cook County Jail officials came into the knowledge that there was a "virus" going through the Jail, because detainee(s) name in the Complaint such as "Bruce Giles" from wing tier 3B of Division Ten (10), at the Cook County Jail, complaining of Stomach Pains, unable to drink enough fluids to replace what diarrhea, vomiting, ect., the Cook County Jail officials named in the suit above, never informed detainee(s) that the "virus" was in their location when they were aware. The Nurse(s) such as Nurse "Price" as well as other Nurses and doctors in division 10, kept the virus hidden from the detainees in division 10, kept the virus hidden from the detainees. It wasn't until the detainees' illness got worst and the problem started to happen to each and every individual the same, such as abdominal cramps (stomach aches), headaches and fevers. These symptoms began around December of 2008, until the time of this suit in its original complaint approximately March of 2009. The National Center for Immunization and Respiratory disease states: gastritis is including Rota-viruses, Noro-viruses, Adeno-viruses, type 40 or 41 Sapor-viruses and Stro-viruses. Viral gastritis is not caused by bacteria such as Salmonella, or Parasites such as Giardial, or by medications or other medical conditions although the symptoms may be similar. Doctors can determine if the diarrhea is caused by a virus or something else.

- 2.) The Plaintiff(s) were told nothing, nor given information or medication or medication or medical advice, and when asked about their conditions, they was denied. The Symptoms of Viral Gastritis were seen through doctors from the National Center for Immunization and Respiratory Diseases. Plaintiff(s) Suffered injuries of Continuing affects of Gastritis, Such as: "Stomach aches, headaches, fever and abdominal cramps. These Symptoms were to Continue for only 1 to 2 days following infections of Virus caused the Illness. Failure of Medical Staff in division 10, refused to treat the Plaintiff(s) Properly, if, at all.

We Suffered actual damages... Without us having knowledge of the Virus, some detainee(s) did take home to young children, wives, Mothers Fathers ect., Due to the Muslims Community of al Mu'min the Islamic Community couldn't make Prayers, because the Viral Gastritis made them Unclean (Haram) for "Wudu" because Gastritis are spreaded through close contact with infected people. For example, by sharing food, water, or eating utensils. Individuals may also become infected by eating or drinking contaminated food or beverages. The use of the fountains and sinks was Unclean to make "Wudu"....

- 3.) The Plaintiff(s) "Muslims" and "Non-Muslim" alike stated that the food was contaminated by gastritis. The Jewish community was able to obtain religious rite through Kosher Meals, while the "Muslims" Such as "Bruce Giles", and Non-Muslims "Suffer the forceful eating of (Haram) Meals, which Violated the faith of "Muslims" and Contrary to the Holy Quran" and "Ibrahim Monotheism.

- 4.) The Plaintiff(s) states: Anyone can incur gastritis, any Person, age, or background. The Same Viruses tend to cause diarrhea diseases Primarily among People of a Specific age group. Due to the numerous Viruses in the Cook County Jail (C.C.D.O.C.), an individual can and have received "infections". "Pro-viruses and older adults in Cook County Jail can catch and Suffer the viruses faster. (C.C.D.O.C.) can assist detainee(s) with Special analysis upon request. The question is that the (C.C.D.O.C.) failed to inform detainees that were released, and to contact them in the start, Shows a Serious Problem. The failure to inform released detainee(s) Placed their families in danger. "Federal rule of Civil Procedure 23(a)" Makes this case "Class Certifiable" Pursuant to 23(a)(1)(2)(3)(4), 23(b), IF We are not allowed to Proceed under a class action, then we should be able to Proceed anyway, because (we) Plaintiff(s) all have Suffered the Same injuries.....

5. The Plaintiff(s) states a (Monell) Claim "Monell v. Dept. of Social Service 436 U.S. 658 (1978), because it was the Custom, Policies, and Procedures of the Cook County Department of Corrections that failed to detect the viruses in the instance. These Issue(s) have been Pleaded in other cases given notice of the conditions of Cook County Jail.....

6.) It was the negligence of the Superintendent "Miller" for not reporting the issue(s) to the higher Authorities such as "Tom Dart" the Cook County Sheriff, but when "Tom Dart" received knowledge of the issue(s) "Tom Dart" concealed the information from the Public's Attention, and allowed for numerous Families of Citizens to suffer. Due to this, "Tom Dart" is guilty under the Pleading of Violating the Plaintiff(s) 14th Amendment Rights, and at all times was acting under "Color of State Law." The Plaintiff(s) suffered injuries due to "Tom Dart's" Negligence to have a Procedure set up for matters of this Nature.....

7.) The Plaintiff(s) States: The Cook County Criminal Courts and the Cook County Jail established a Policy of denying detainee(s) the right to go to court to have their matters adjudicated before a Magistrate Judge. This conspiracy between Cook County Jail officials, violates the 14th Amendment of the United States Constitution. The defendant(s) infringed the rights of the Plaintiff(s) by denying the Plaintiff(s) life, liberty, property without due process of the Law. No state shall infringe the rights of its citizens or make any rule, statute, regulation, policies, and custom, violates the Plaintiff(s) Constitutional rights under the 5th, 6th and 14th Amendment to the constitution of 1970: Article I Section 2, which affords to the citizens of this state "equal protection of the Law." Pursuant to 725 ILCS 5/103-5(A) Speedy Trial. The court continued the court proceedings by agreement without the knowledge of the Plaintiff(s) who are defendant(s) being held in custody by the Cook County Jail.

Relief Sought

8.) The Principal facts and issue(s) in this case are: (1) That the Plaintiff(s) were prevented from receiving the knowledge of the viruses, which was reported by the "C.D.C." on February 12th, 2009, to the Cook County Jail, but the defendant(s) failure to inform detainee(s) of Major health issues, lead to the detainee(s) carrying of the virus gastritis. The Plaintiff(s) are seeking Ten Million dollars (\$10,000,000.00), for Pain, Suffering and Punitive damages. Also seeks injunctive relief for Cook County to conform their policies to protect detainee(s) from any possible future "viruses and diseases." Also seeking Declaratory Judgment for the court to declare defendant(s) policies unconstitutional by not putting up notice in every unit to inform detainee(s) that virus was in the facility so that they would have known to protect themselves from harmful conditions.

Respectfully Submitted
Plaintiff(s)

1. Bruce Giles
2. Jose H Romero
3. LEE McCorker

IN the UNITED STATES DISTRICT Court for the
Northern District of Illinois
Eastern Division

Bruce Giles et al.,)
"Class action") CIVIL No. 09CV2071
Plaintiff(s))
V.S.) Hon. Judge: KENNELLY
) Mag. Judge: ASHMAN
Tom Dart et al.,)
Defendant(s))
Notice of Filing

Please take notice! Bruce Giles has cause on the date of June 22nd, 2009, to be filed with the Clerk of the federal Court. His Second Amended Complaint for CIVIL Case 09CV2071.

- 1.) Notice of Filing
- 2.) Second Amended Complaint

Respectfully Submitted
Bruce Giles
Bruce Giles